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MEMBERS OF NJ & NY BAR

VIA CM/ECF FILING

February 13, 2024

The Honorable Dale E. Ho
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007
HoNYSDChambers@nysd.uscourts.gov

Re: Tang v. Qiao, et al. No. 1:23-cv-8760
Plaintiff's status letter pursuant to
Court's February 8, 2024 Order

Your Honor,

Pursuant to Court's February 8, 2024 Order ("Order"), Plaintiff respectfully files this letter on the status of service on the foreign entities.

On the same date of the Order, we contacted the process server for status update. While they were not able to provide a definitive date of completion of service on each foreign Defendant at this time, the original estimate of 2-6 months remains the same. Please refer to the attached email exchange.

As for Defendant HSBC Hong Kong, there is only one entity in Hong Kong can be referred to as HSBC Hong Kong, which and the address of which are clearly defined in the Amended Complaint [Dkt No. 3] and Summons. The Hong Kong local rules of service of

process may allow the completion of service. As such, Plaintiff will not voluntarily dismiss the claims against HSBC Hong Kong at this time.

Additionally, Plaintiff has served a copy of the Order on each of Defendants Jianjun Qiao, Shilan Zhao and Yuxin Qiao via Federal Express. The proof of service is filed on ECF separately.

Thank you very much.

Respectfully,

A handwritten signature in black ink, appearing to be 'JY Tang', written in a cursive style.

John Y. Tang
Counsel for Plaintiff

JYT/el

Encl.:

Cc: All counsel of record (via CM/ECF filing)

From: International Service <global@judicialsupport.com>
Sent: Thursday, February 8, 2024 3:18 PM
To: john.tang@gettang.com
Subject: Re: Ways to Pay - Formal Service for 5 International Defendants

Hello John:

4 applications have already been shipped to the Central Authorities. The timeline for each is on the official quote email we sent you -- depending on the country it will take 2-6 months for service. Once we have confirmed that the Central Authority has received them you will receive a "Status Update" for each service and you will also receive portal access information.

We are shipping today the service for HSBC Canada.

Thanks
Maria J. Gutierrez *

On Thu, Feb 8, 2024 at 2:01 PM <john.tang@gettang.com> wrote:

Karen,

Would you please confirm the receipt of signed USM94 forms.

Also, would you please provide an updated time of completion of service on the five foreign banks as requested by the Court?

Thank you.

John